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VIA ECF

August 17, 2022

Honorable Lorna G. Schofield  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Network Data Rooms, LLC v. Saulrealism LLC et al* (22-cv-02299-LGS)  
Consent Application to stay Civil Case Management Plan and Scheduling Order

Your Honor:

Please be reminded that Goldberger & Dubin, P.C., represents the Defendants in this action, Saulrealism LLC, and Ryan Saul. On August 16, 2022 the Court issued an Order for the Plaintiff to Show Cause as to why the Court should not impose sanctions up to and including dismissal of this action and a referral to the United States Attorney's Office for the Southern District of New York for perjury and statements made to this Court. [Dkt No. 75]. A briefing schedule was ordered, and an evidentiary hearing is scheduled for September 20, 2022.

The Defendants request that the Court grant an application staying the Civil Case Management Plan and Scheduling Order, So Ordered on May 11, 2022 until after the determination of the Order to Show Cause. I have conferred the matter with Plaintiff's counsel, and Plaintiff consents to this request.

Pursuant to the Scheduling Order, the parties are to complete fact discovery by September 15, 2022, including depositions. Due to the complexities of the case and the potential sanctions involved, it is requested that the period for fact discovery be extended or stayed.

Respectfully submitted,

Goldberger & Dubin, P.C.

/s/Renee M. Wong  
Renee M. Wong, Esq.  
On behalf of Defendants  
*Of Counsel*